

1 WRIGHT, FINLAY & ZAK, LLP
2 Darren T. Brenner, Esq.
3 Nevada Bar No. 8386
4 Lindsay D. Robbins, Esq.
5 Nevada Bar No. 13474
6 7785 W. Sahara Ave., Suite 200
7 Las Vegas, NV 89117
8 (702) 637-2345; Fax: (702) 946-1345
9 lrobbins@wrightlegal.net
10 *Attorneys for Plaintiff, DLJ Mortgage Capital, Inc.*

11
12 **UNITED STATES DISTRICT COURT**
13 **DISTRICT OF NEVADA**

14 DLJ MORTGAGE CAPITAL, INC.,

15 Plaintiff,

16 vs.

17 FIDELITY NATIONAL TITLE GROUP,
18 INC.; CHICAGO TITLE INSURANCE
19 COMPANY; CHICAGO TITLE AGENCY
20 OF NEVADA; DOE INDIVIDUALS I through
21 X; and ROE CORPORATIONS XI through
22 XX, inclusive,

23 Defendants.

Case No.: 2:20-cv-02251-APG-DJA

**STIPULATION AND ORDER TO
EXTEND TIME PERIOD TO RESPOND
TO MOTIONS TO DISMISS [ECF Nos.
14-16]**

[First Request]

24 Plaintiff DLJ Mortgage Capital, Inc. (“DLJ Mortgage”), Specially-Appearing Defendant
25 Fidelity National Title Group, Inc. (“Fidelity”) and Defendants Chicago Title Insurance
26 Company (“Chicago”) and Chicago Title Agency of Nevada (“Chicago Agency”, collectively
27 “Defendants”), by and through their counsel of record, hereby stipulate and agree as follows:

- 28 1. On December 13, 2020, DLJ Mortgage filed its Complaint in Eighth Judicial District
Court, Case No. A-20-826196-C [ECF No. 1-1];
2. On December 13, 2020, Chicago Title filed its Petition for Removal to this Court
[ECF No. 1];
3. On January 27, 2021, Chicago Title filed a Motion to Dismiss [ECF No. 14];
4. On January 27, 2021, Chicago Agency also filed a Motion to Dismiss [ECF No. 15];
5. On January 27, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 16];

- 1 6. DLJ Mortgage's deadline to respond to Defendants' Motions to Dismiss is currently
2 February 10, 2021;
3 7. DLJ Mortgage's counsel is requesting an extension until March 15, 2021, to file its
4 response to the pending Motions to Dismiss;
5 8. This extension is requested to allow DLJ Mortgage additional time to finalize and
6 file its response to the pending Motions to Dismiss as lead handling counsel for DLJ
7 Mortgage continues to recover from an unexpected medical emergency.
8 9. Counsel for Defendants does not oppose the requested extension;
9 10. This is the first request for an extension which is made in good faith and not for
10 purposes of delay.

11 **IT IS SO STIPULATED.**

12 DATED this 9th day of February, 2021.

DATED this 9th day of February, 2021.

13 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

14 /s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

15 Lindsay D. Robbins, Esq.
16 Nevada Bar No. 13474
17 7785 W. Sahara Ave., Suite 200
18 Las Vegas, NV 89117
19 *Attorneys for Plaintiff, DLJ Mortgage*
20 *Capital, Inc.*

Kevin S. Sinclair, Esq.
Nevada Bar No. 12277
16501 Ventura Boulevard, Suite 400
Encino, California 91436
Attorney for Defendants, Fidelity National
Title Group, Inc., Chicago Title Insurance
Company, and Chicago Title Agency of
Nevada

21 **IT IS SO ORDERED.**

22 Dated this 10th day of February, 2021.

23 
24 UNITED STATES DISTRICT COURT JUDGE
25
26
27
28